

EXHIBIT A
TO
DOORAGE'S MOTION FOR
INJUNCTIVE RELIEF

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DOORAGE, INC.,)	
)	
Plaintiff,)	
)	Case No.: 1:20-cv-421
v.)	
)	
BLUE CRATES, LLC,)	
)	
Defendant.)	

**DEFENDANT BLUE CRATES, LLC'S ANSWERS TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES**

Defendant Blue Crates, LLC, by and through its attorneys, Maron Marvel Bradley Anderson & Tardy, LLC, hereby answers Plaintiff's First Set of Interrogatories as follows:

Interrogatory 1:

State the full name of any and all individuals who have an ownership interest in Blue Crates, LLC, the amount of interest in Blue Crates held by each owner, and the date when each owner acquired interest in Blue Crates.

ANSWER: **See the produced Capitalization Table for Blue Crates, LLC, attached as BC 016.**

Interrogatory 2:

State the amount of total gross revenue of Blue Crates separately for each year beginning January 1, 2015 through present.

ANSWER: **2015: \$8,753**
 2016: \$16,093
 2017: \$46,131
 2018: \$21,824
 2019: \$44,483

Interrogatory 3:

State the amount of Blue Crates' claimed tax deduction for advertising costs for each year beginning January 1, 2015 to present as reported to the Internal Revenue Service. If Blue Crates has not filed a tax return with the Internal Revenue Service for any year during the

Identify by name, address and telephone numbers, investment amounts, and dates of investment for Blue Crates' capital investors for the years 2015 to present.

ANSWER: Defendant objects to this interrogatory as overly broad, unduly burdensome, and not reasonably tailored to relevant and admissible evidence. Subject to the foregoing objections, see the produced Capitalization Table for Blue Crates, LLC, attached as BC 016.

Interrogatory 14:

Identify any and all past and/or current business relationships between Blue Crates and Elmdale Partners, including but not limited to Thomas Bretz and/or Elmdale Ventures.

ANSWER: Defendant objects to this interrogatory as overly broad, unduly burdensome, and not reasonably tailored to relevant and admissible evidence as the company and individual had no involvement with the creation or publication or marketing materials.

Interrogatory 15:

Identify any and all past and/or current business relationships between Blue Crates and PROJEKT 202, regardless of whether the Blue Crates entered into any formal business relationship with PROJEKT 202.

ANSWER: Defendant objects to this interrogatory as overly broad, unduly burdensome, and not reasonably tailored to relevant and admissible evidence. Subject to the foregoing objections, Defendant does not have a relationship with PROJEKT 202.

Interrogatory 16:

Identify the current members of Blue Crates' board of directors for each year 2015 to present, including each member's position(s) on the Board during each of those years.

ANSWER: Blue Crates' does not have a board of directions. The company has a Manager, Richfield Holdings, which is owned by Matthew and Michael Walker.

Interrogatory 17:

CERTIFICATE OF SERVICE

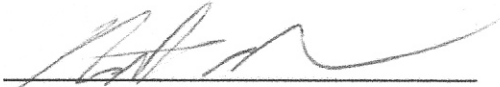
I hereby certify that I served the foregoing discovery requests to the party(ies) listed below via electronic mail on this 17th day of August, 2020.

Sharon K. Jackson, Attorney
1708 Sunset Boulevard, 2d Floor
Houston, Texas 77005
Telephone: 713/542-7491
Email: Sharon@JacksonAttorney.net
ATTORNEY FOR PLAINTIFF,
DOORAGE INC.

/s/ Katherine J. Curtis
Katherine J. Curtis

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he is authorized by this defendant to act as its agent and provide this verification, and further states that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true. 735 ILCS 5/1-109.


Matthew Walker

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Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he is authorized by this defendant to act as its agent and provide this verification, and further states that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true. 735 ILCS 5/4-109.


Michael Walker